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19 CHICAGO TITLE INSURANCE COMPANY and CHICAGO
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21 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
22 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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26 **UNITED STATES DISTRICT COURT**

27 **DISTRICT OF NEVADA**

28 BANK OF NEW YORK MELLON,

Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC. et al.,

Defendants.

Case No.: 2:21-CV-00397-APG-DJA

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
THE COMPLAINT (ECF No. 1)**

FIRST REQUEST

COMES NOW defendants Chicago Title Insurance Company (“Chicago Title”) and
Chicago Title of Nevada, Inc. (“Chicago Agency”) (collectively “Defendants”) and plaintiff The
Bank of New York Mellon (“BONY”), by and through their respective attorneys of record, which
hereby agree and stipulate as follows:

1 1. On March 8, 2021 BONY filed its complaint in the Eighth Judicial District Court
2 for the State of Nevada;

3 2. On March 9, 2021, Chicago Title removed the instant case to the United States
4 District Court for the State of Nevada (ECF No. 1);

5 3. Chicago Agency's response to BONY's complaint is currently due on April 13,
6 2021, while Chicago Title's response is due on April 15, 2021;

7 4. Counsel for Defendants request a 32-day extension for Chicago Title (34 days for
8 Chicago Agency) through and including Monday, May 17, 2021 for Defendants to file their
9 respective responses to BONY's complaint to afford Defendants' counsel additional time to
10 review and respond to BONY's complaint.

11 5. Counsel for BONY does not oppose the requested extension;

12 6. This is the first request for an extension made by counsel for Defendants, which is
13 made in good faith and not for the purposes of delay.

14 7. This stipulation is entered into without waiving any of Defendants' objections
15 under Fed. R. Civ. P. 12.

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1 **IT IS SO STIPULATED** that Defendants' respective deadlines to respond to the
2 complaint are hereby extended through and including Monday, May 17, 2021.

3 Dated: April 8, 2021

SINCLAIR BRAUN LLP

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5 By: /s/-Kevin S. Sinclair
6 KEVIN S. SINCLAIR
7 Attorneys for Defendants
8 CHICAGO TITLE INSURANCE COMPANY
9 and CHICAGO TITLE OF NEVADA, INC.

8 Dated: April 8, 2021

WRIGHT FINLAY & ZAK, LLP

10 By: /s/-Darren T. Brenner
11 DARREN T. BRENNER
12 Attorneys for Plaintiff
13 THE BANK OF NEW YORK MELLON

13 **IT IS SO ORDERED.**

14 DATED this 9th day of April, 2021.

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17 DANIEL J. ALBREGTS
18 UNITED STATES MAGISTRATE JUDGE
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